

Sarah E. Josephson, Esq.  
JERMAIN, DUNNAGAN & OWENS, P.C.  
3000 'A' Street, Suite 300  
Anchorage, Alaska 99503  
(907) 563-8844

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

TRUSTEES of the ALASKA TROWEL TRADES  
PENSION AND APPRENTICESHIP TRUST  
FUNDS, and the ALASKA LABORERS HEALTH  
AND SECURITY FUND,

Plaintiffs,

Case No. 3:05-CV-141-RRB

vs.

GENERAL CONCRETE, INC.,

Defendant.

STATE OF ALASKA )  
 ) ss.  
THIRD JUDICIAL DISTRICT )

**AFFIDAVIT OF TANA HART**

Tana Hart, being first duly sworn, deposes and states as follows:

1. I am the Collections Coordinator for the Laborers Trust Funds and have knowledge of the facts stated herein. The statements made in this affidavit are true and correct to the best of my knowledge.

2. The document attached as Exhibit 4 to plaintiffs' Memorandum in Support of Motion for Entry of Default Judgment is a true and correct copy of the audit performed by Lockitch, Clements & Rice of the payroll examination of General Concrete, Inc. for the period

January 2003 through December 2003 for amounts due to the Alaska Laborers-Employers Health Trust Fund. Exhibit 4, page 1, references unreported hours as determined through examination of payroll check registers, information provided by employer, a State quarterly payroll tax report, and Federal W-2 forms for the period January 2003 through December 2003, relating to account numbers 37401, 37403 and 37411 available to Lockitch, Clements & Rice at the time of examination.

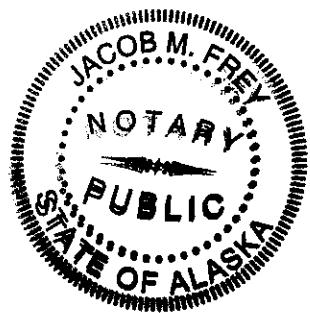
3. As reflected in Exhibit 4, General Concrete, Inc. owes contributions to the Alaska Laborers Trust Funds for 281 unreported hours for the period of April 2003 and June through October 2003.

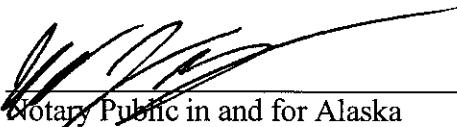
FURTHER YOUR AFFIANT SAYETH NAUGHT.

Date: 5-2-06

  
Tana Hart

SUBSCRIBED AND SWORN to before me this \_\_\_\_ day of May, 2006.



  
Notary Public in and for Alaska  
My Commission Expires: 4-07-09

LAW OFFICES OF  
JERMAIN DUNNAGAN & OWENS  
A PROFESSIONAL CORPORATION  
3000 A STREET, SUITE 300  
ANCHORAGE, ALASKA 99503  
(907) 563-8844  
FAX (907) 563-7322  
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